

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LINCOLN NATIONAL REINSURANCE
COMPANY (BARBADOS) LIMITED

and

THE LINCOLN NATIONAL LIFE INSURANCE
COMPANY,

Plaintiffs,

-against-

SWISS RE LIFE & HEALTH AMERICA
HOLDING COMPANY,

Defendant.

Case No. 07 cv 6731 (GBD) (FM)

(Oral Argument Requested)

**DECLARATION OF
LARA E. ROMANSIC**

LARA E. ROMANSIC states as follows:

1. I am a member of the Bar of this Court and associated with the firm of Steptoe & Johnson LLP, counsel for defendant Swiss Re Life & Health America Holding Company in the above-captioned case. I make this declaration in support of defendant's motion to dismiss or, in the alternative, stay litigation pending arbitration.

2. Annexed hereto as **Exhibit A** is a true and correct copy of the Demand for Arbitration Pursuant to Treaty Dated October 23, 2001 between Lincoln National Reinsurance Company (Barbados) Limited and Swiss Re Life and Health (Ireland) Limited, as Successor to Lincoln Re (Ireland) Limited, dated July 26, 2007 (the "Demand for Arbitration").

3. Annexed hereto as **Exhibit B** is a true and correct copy of Lincoln National Reinsurance Company (Barbados) Limited's Response to the Demand for Arbitration, dated August 3, 2007 (the "Response to the Demand for Arbitration").

4. Annexed hereto as **Exhibit C** is a true and correct copy of the Indemnity Reinsurance Agreement between Lincoln National Reinsurance Company (Barbados) Limited and Lincoln Re (Ireland) Limited, effective as of October 1, 2001 (the "Treaty").

5. Annexed hereto as **Exhibit D** is a true and correct copy of the Indemnity Reinsurance Agreement between The Lincoln National Life Insurance Company and Lincoln Re (Ireland) Limited, effective as of June 30, 2001 (the "June 2001 Treaty of Reinsurance").

6. Annexed hereto as **Exhibit E** is a true and correct copy of the Put Agreement by and between Lincoln National Reinsurance Company (Barbados) Limited and Swiss Re Life & Health America Inc., dated July 27, 2001 (the "Put Agreement").

7. Pursuant to 28 U.S.C.A. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 20, 2007
New York, New York



Lara E. Romansic